

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Greenbelt Division)**

In re:	*	Case No. 15-24430-WIL
	*	(Chapter 7)
SOLENA FUELS CORPORATION	*	
	*	
Debtor.	*	

**NOTICE OF MOTION FOR ENTRY OF AN ORDER
APPROVING A PROPOSED SALE AND SETTLEMENT AGREEMENT**

NOTICE IS HEREBY GIVEN THAT Gary A. Rosen, Chapter 7 trustee for the bankruptcy estate of Solena Fuels Corporation (the “Trustee”) has filed a Motion for Entry of an Order Approving a Proposed Sale and Settlement Agreement (the “Motion”). The Motion has been filed with the Clerk, U.S. Courthouse, 6500 Cherrywood Lane, Greenbelt, Maryland 20770. The Motion seeks approval of a sale of claims by the Trustee and further approval of a mutual waiver and release among the trustee and certain named creditors therein (the agreement is attached to the Motion and is herein referred to as the “Settlement Agreement”). A summary of the terms of the proposed compromise is set forth below.

The Motion, if granted, will approve a sale of certain claims held by the Trustee against Dr. Robert T. Do, MS., MD. (which are set forth on that certain complaint filed in the above captioned bankruptcy case as an Adversary Proceeding filed on November 30, 2017, Adversary Proceeding No.: 17-000471 (the “Complaint”)) to the following creditors of the Bankruptcy Estate: Rajeev Sharma, Aryeh Davis, Avi Hoffer, Richard Wenzel, Brian Miloski, Joseph Carlin, Richard Cohen, Arthur Samberg, GreenFuel Technology LLC, Acadia Woods Partners, LLC, Samberg Family Foundation, Inc., SGNA LLC, GA Development, LLC, SAN Development Company, LLC, ZLC Investments, LLC, ALQIMI GE&F Holdings, LLC, and ALQIMI Technology Solutions, Inc. (being the “ALQIMI Parties”). The Motion, if granted, will also approve the waiver and mutual release of any and all claims held by the Trustee or the ALQIMI Parties against the other. In exchange for such sale and mutual release, the ALQIMI Parties agree to pay the Trustee the sum of \$150,000 (the “Settlement Sum”), and further agree to waive the right to the distribution of the Settlement Sum by the Trustee. Pursuant to the Settlement Agreement, any and all reasonable, necessary, and agreed upon attorneys’ fees and expenses incurred by the Trustee in prosecution of the Complaint on or after December 1, 2017, shall be reimbursed by the ALQIMI Parties. **The foregoing is only a summary of the terms of the Settlement Agreement and is not intended to be a comprehensive analysis of the terms of the agreement. Any party intending to rely on the terms of the Agreement is directed to the Motion.** In the event of a contradiction between the summary herein and the terms of the Settlement Agreement, such terms of the Settlement Agreement shall control.

The Trustee submits that the proposed Settlement Agreement is in the best interest of the Debtor's bankruptcy estate. After limited analysis, and provided additional fact discovery, the Trustee has determined that the claims sold and the claims waived and release by the Trustee are valuable to the estate and able to produce positive proceeds as a result of the prosecution of such claims. However, the Trustee has determined that the costs to the estate in prosecuting such claims by the Trustee would involve significant time and legal expense and unlikely to produce positive net proceeds to the estate. The Trustee submits that sale of certain claims, and waiver of certain other claims, in consideration for the receipt of the Settlement Sum (achieved through arms' length negotiations) would result in a greater net benefit to the estate than prosecuting any of such claims.

NOTICE IS FURTHER GIVEN that objections, if any, to the Motion must be filed by **FEBRUARY 15, 2018** (not less than twenty-one (21) days from the date of this Notice). Objections must be filed with the Clerk, U.S. Courthouse, 6500 Cherrywood Lane, Greenbelt, Maryland 20770. Any objections must also be served on the undersigned. Objections must set forth in detail the legal and factual grounds upon which they are based. The Court, in its discretion, may conduct a hearing or determine this matter without a hearing regardless of whether an objection is filed. The Motion may be granted without further order or notice in no timely objection is filed. **CREDITORS OR ANY OTHER INTERESTED PARTIES DESIRING FURTHER INFORMATION ARE ENCOURAGED TO CONTACT THE UNDERSIGNED.** A copy of the Motion is available for review at the clerk's office U.S. Courthouse, 6500 Cherrywood Lane, Greenbelt, Maryland 20770, or upon request made to the undersigned.

A hearing on objections to the Motion, if any, has been scheduled for Thursday, February 22nd at 2:00 p.m., in Courtroom 3-C, U.S. Courthouse, 6500 Cherrywood Lane, Greenbelt, Maryland 20770. If no objections to the Motion are filed within the time set forth above, then the sale may be approved without a hearing and the property may be sold without further notice.

Dated: January 25, 2018

Respectfully submitted,

/s/ Paul Sweeney

Paul Sweeney, Esquire, 07072
 Andrew Gerlowski, Esquire, 19953
 Yumkas, Vidmar, Sweeney & Mulrenin, LLC
 10211 Wincopin Circle, Suite 500
 Columbia, Maryland 21044
 Phone: (443) 569-5972
 Fax: (410) 571-2798
 Email: psweeney@yvslaw.com
 Email: agerlowski@yvslaw.com
 Counsel for Plaintiff, Gary A. Rosen,
 Chapter 7 Trustee of Solena Fuels Corporation

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of January, 2018, notice of filing the Notice Motion for Entry of an Order Approving Proposed Settlement Agreement was served by CM/ECF to those parties listed on the docket as being entitled to such electronic notice and by electronic mail or first class mail, postage prepaid as indicated on the attached service list.

/s/ Paul Sweeney
Paul Sweeney

Service by first class mail, postage prepaid:

Steven H Greenfeld
Cohen, Baldinger & Greenfeld, LLC
2600 Tower Oaks Blvd., Suite 103
Rockville, MD 20852-4281

Solena Fuels Corporation
9210 Corporate Blvd, Suite 150
Rockville, MD 20850-6285

AECOM Limited/
AECOM House
63-77 Victoria Street
St. Albans Herts AL1 3ER
United Kingdom

ALQIMI GE&F Holdings, LLC
c/o ALQIMI Group
Attn. Joseph Carlin
9210 Corporate Blvd. Ste. 150
Rockville, MD 20850-6285

American Business Appraisers, LLP
3800 Blackhawk Road, Suite 140
Danville, CA 94506-4650

Aryeh Davis
Four Copperbeech Lane
Lawrence, NY 11559-2606

BDO
8405 Greenboro Drive, Suite 700
McLean, VA 22102-5108

Barclays Capital PLC
5 The North Colonnade
Canary Wharf London, E14 4BB
United Kingdom

Blue Cross Blue Shield
840 1st Street, NE
Washington, DC 20065-0003

Brian Miloski
1964 Crescent Park Drive
Reston, VA 20190-3288

British Airways PLC
Waterside PO Box 365
Harmondsworth, UB7 0GB
United Kingdom

CC Solutions
75 Grandview Blvd
Yonkers, NY 10710-3042

CPA Global Limited
Liberation House
Castle Street, St. Helier
Jersey JE1 1B2
United Kingdom

CareFirst BlueCross BlueShield
1501 S. Clinton Street, CT10-06
Baltimore, MD 21224-5730

Carlisle Investments Inc.
c/o Lonsin Capital
15 Bolton Street London W1J 8BG
United Kingdom

Comcast Cable Communications
P.O. Box 3006
Southeastern, PA 19398-3006

Comptroller of the Treasury
Compliance Division, Room 409
301 W. Preston Street
Baltimore, MD 21201-2305

Corporation Service Company
2711 Centerville Rd., Ste 400
Wilmington, DE 19808-1646

Credit Protection Association LP
13355 Noel Road
Dallas, TX 75240-6837

Crystal Vision Energy Limited
Unit 3201, 52F
148 Electric Road
HONG KONG

DLA Piper
6225 Smith Avenue
Baltimore, MD 21209-3600

David Lyle
15 Cleerebrook Place
The Woodlands, TX 77382-1315

EC Harris
ECHQ, 34 York Way
London NI 9AB
United Kingdom

Esler & Company Limited
c/o Lonsin Capital
15 Bolton Street London W1J 8BG United
Kingdom

FTI Consulting, Inc.
Attn. Matthew Bacsardi
2 Hamill Road, North Bldg.
Baltimore, MD 21210-1816

FedEx Express/FedEx TechConnect
c/o Synter Resource Group, LLC
5935 Rivers Avenue, Ste. 102
Charleston, SC 29406-6071

Floor Mill Georgetown LLC
1000 Potomac Street, NW
Washington, DC 20007-3501

Fluor Enterprises Inc.
3 Polaris Way
Aliso Viejo, CA 92656-5338

Fluor Limited
140 Pinehurst Road
Farnborough GU14 7BF
United Kingdom

Ford Harrison LLP
1300 19th Street, NW, Ste 300
Washington, DC 20036-1628

David Schwinger, Esq.
Law Offices of David Schwinger PLLC
2519 P Street, NW
Washington, DC 20007

SGI, Inc.
Attn: Dr. Do
10600 Red Barn Lane
Potomac, MD 20854

Dr. Do
10600 Red Barn Lane
Potomac, MD 20854

GA Development LLC Attn.
Avi Hoffer
8230 Ritchie Highway
Pasadena, MD 21122-3908

Greenfuel Technology, LLC
23020 Eaglewood Ct., Ste 400
Sterling, VA 20166-9503

Greenfuel Technology, LLC c/o
GTS Group
Attn. Richard Wenzel
23020 Eaglewood Court, Ste. 400
Sterling, VA 20166-9503

Honeywell Process Solutions
3079 Premier Pkwy, Suite
100
Duluth, GA 30097-5245

Kenneth S. Nankin
Nankin & Verma PLLC
4550 Montgomery Avenue, Suite 775N
Bethesda, MD 20814-3376

Leidos
835 Kolding Avenue
Solang, CA 93463-2236

Leidos, Inc.
c/o Kristin M Grimes
11955 Freedom Drive
Reston, VA 20190-5651

MGA Consultants, Inc
6031 University Blvd., Suite 300
Ellicott City, MD 21043-6151

Marco Maximilian Elser
Via Sistina 121
Roma, Italia 00187

Norton Rose Fulbright LLC
3 More London Riverside
London SE1 2AQ
UNITED KINGDOM

Novak Druce Connolly Bove
& Quigg, LLP
1007 N. Orange Street, Ninth Floor
Wilimington, DE 19801-1239

Office of Tax and Revenue
1101 4sth Street, SW
Washington, DC 20024-4457

Patton Boggs
2550 M Street, NW
Washington, DC 20057-0001

Phoenix Solutions Co.
3327 Winpark Drive
Minneapolis, MN 55427

Procetech
4 Chemin de l'glise,
78490 Bazoches-sur-Guyonne
FRANCE

Reaction Engineering Intl
746 E. Winchester St., Ste 120
Murray, UT 84107-8507

SFI Investors LLC
Attn. Robert Do
10600 Red Barn Lane
Potomac, MD 20854-1953

SGNA LLC as Collateral Agent
c/o Jonathan L Gold
LeClairRyan
2318 Mill Road, Suite 1100
Alexandria, VA 22314-6834

SGNA LLC, as Collateral Agent
Jonathan L. Gold
LeClairRyan
2318 Mill Road, Suite 1100
Alexandria, VA 22314-6834

SGNA, LLC
c/o Hawkes Financial LLC
Attn. Aryeh Davis
77 Bedford Road
Katonah, NY 10536-2141

SIELTE, S.P.A.
Via Valle di Perna, 1
Attn. Alfio Turrisi
00128- Roma
ITALIA

Samer & Co. Shipping, S.P.A.
Piazza dell'Unuta D'Italia, 7
Attn, Erico Samer 34121
Trieste, Italy

Seyforth Shaw LLP
975 F Street NW
Washington, DC 20004-1454

State of Maryland DLLR
Div. of Unemployment Insurance
1100 N. Eutaw Street, Room 401
Baltimore, MD 21201-2225

TML Copiers
9700 Capital Court, #201
Manassas, VA 20110-2047

Taxing Authority of Montgomery Co.
Division of Treasury
255 Rockville Pike, Ste. L-15 Rockville,
MD 20850-4188

The Delaware Department of State
Division of Corporations
P.O. Box 898
Dover, DE 19903-0898

Velocys
115e Olympic Avenue
Abingdon OX14 4SA
United Kingdom

Gary A. Rosen
One Church Street, Suite 800
Rockville, MD 20850-4164

James G. Cochran
7704 Mapleville Road
P.O. Box 222
Boonsesboro, MD 21713-0222

SFI Investors, LLC
c/o Corporation Trust Co.
Corporation Trust Center
1209 Oragne Street
Wilmington, DE 19801

SGL, Inc.
c/o Corporation Trust Co.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

SGL, Inc.
c/o Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

Service by electronic mail:

Mark H. M. Sosnowsky
Drinker Biddle & Reath LLP
1500 K Street, N.W.
Washington, DC 20005-1209
Mark.Sosnowsky@dbr.com